

EXHIBIT 1

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DECLARATION OF MIKAL C. WATTS

Mikal C. Watts declares the following pursuant to 28 U.S.C. § 1746:

1. I am an individual over 18 years of age and competent to make this Declaration.

2. I am an attorney with the law firm of Watts Guerra LLP, attorneys of record for thousands of victims of the fires started by PG&E in 2017 (the twenty fires generally referred to as the “North Bay”), 2018 (“Camp Fire”) and 2019 (“Kincade Fire”).

3. If called upon to do so, I could and would competently testify as to the facts set forth in this Declaration.

4. The facts set forth below are true of my personal knowledge

5. I make this Declaration in support of the motion to allow late filing of proofs of claim (“Motion”) on behalf of Catlin Rice Tucker, Darian Rahgani Tucker, M.T., a minor, C.R.T., a minor and Catlin Rice Tucker & Darian Rahgani Tucker TEES U/A dated 10/19/2011 (“Movants”), who lost their home in the Tubbs Fire.

6. The clients did not have a claim filed before the December 31, 2019 claims bar date due to excusable neglect and should be allowed to file a proof of claim after the bar date.

7. On December 12, 2019, attorney Noreen Evans forwarded via email a contract and questionnaire for completion by the Movants. On December 15, 2019, the Movants responded to Ms. Evans advising they were ready to move forward as clients with a PG&E claim. On December 16, 2019, Noreen Evans responded via email advising the Movants, a fully executed contract and questionnaire would be required. In mid-January, 2020, the Movants emailed just to check in but failed to copy Watts Guerra. On May 9, 2020 and again on May 17, 2020, Movants contacted Noreen Evans, regarding an update on their claim. It was determined that the executed contract and questionnaire for the Movants had never been received electronically by Watts Guerra LLP.

8. On April 27, 2020, Watts Guerra LLP filed claim number 103519, 103520, and

1 103521, on behalf of the Movants (“Subject Proofs of Claim”). A true and correct copy of the
2 Subject Proofs of Claim is attached collectively as Exhibit “A”.

3 I declare under penalty of perjury under the laws of the State of California that the forgoing
4 is true and correct and executed this 26th day of May 2020.
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7 /s/ Mikal C. Watts
Mikal C. Watts
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